

**Remarks**

Applicants respectfully request reconsideration of the present U.S. Patent application, in light of the amendments above and remarks below. Claims 1-4, 7, 8, 12, 15, 16, 19, and 26-33 stand rejected. Claims 5, 6, 9-11, 17, 18, and 20-25 were previously cancelled. Claims 1, 8, 12, 26, 30 and 31 are presently amended. No claims are presently withdrawn, cancelled or added. Thus, claims 1-4, 7, 8, 12, 15, 16, 19, and 26-33 are pending.

**APPLICANTS RESPECTFULLY MAINTAIN THAT REJECTIONS BASED ON KAISER ARE MOOT**

Applicants respectfully maintain all of the Office Action's rejections based on Kaiser are moot for at least the reasons stated in prior responses. However, Applicants hold further mootness arguments and presentation of evidence in abeyance in view of the amendments above and remarks below. Applicants reserve the right to introduce further evidence and argument in the future to support their position that rejections involving Kaiser are moot.

**SUPPORT FOR AMENDMENTS**

Applicants submit the amendments to the claims find support in the original specification as filed. Amendments to claims 1, 8, 12, 26, 30 and 31 find support from at least pages 6-9 in the specification as filed.

**REJECTIONS UNDER 35 U.S.C. §102(e)**

Claims 1, 3, and 7 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kaiser, et al. (U.S. Pub. No. 2002/0120724; "KAISER"). Claims 1, 3, 7, 26, and 28 stand rejected under 35 U.S.C. §102(e) as being anticipated by Hollstrom, et al. (U.S. Pat. No.

6.968.365; “HOLLSTROM”). Applicants overcome these rejections in view of the amendments made above and the remarks that follow.

Regarding KAISER, applicants respectfully submit KAISER does not anticipate claim 1 because KAISER does not teach at least “an infrared interface to receive *infrared signals* that originate externally to the server and *communicate user input* network *configuration data for the network interface*,” a recitation of claim 1 (emphasis added). Nor does KAISER disclose “circuitry coupled with the display and the network interface to provide, in part, a confirmation *display of the network interface configuration* wherein the network configuration data was received through the infrared interface,” a further recitation of claim 1 (emphasis added).

KAISER does not disclose infrared signals that communicate user input network configuration data for the network interface. Instead, KAISER describes only “a computer-readable medium”, a “transmission medium”, and “infra-red ... communications,” wherein a “transmission medium” is a species within the genus “a computer-readable medium” and “infra-red ... communications” is a species within the genus “transmission medium”. KAISER at ¶ 45. While KAISER does teach user “input device[s] ... coupled to bus ...,” KAISER is silent with respect to infrared transmission of user input. KAISER at ¶ 43. Thus, Applicants respectfully submit KAISER does not anticipate amended claim 1.

Further, KAISER does not disclose a display of the network configuration information. KAISER merely teaches “a display ... such as a cathode ray tube (CRT), for displaying information to a computer user” and is silent with regard to network

configuration information. KAISER at ¶ 43. Applicants thus submit another reason that KAISER does not anticipate amended claim 1.

Regarding HOLLSTROM, Applicants respectfully submit that HOLLSTROM does not anticipate claim 1 because HOLLSTROM does not teach at least

*a server comprising:*

*a display device; and*

*circuitry coupled with the display and the network interface* to provide, in part, a *confirmation display* of the network interface configuration data received through the infrared interface

a recitation of amended claim 1 (emphasis added).

HOLLSTROM does not disclose a server comprising a display and circuitry coupled with the display and network interface to provide a confirmation display of network interface configuration. Instead, HOLLSTROM describes a WAP server module distinct from a WAP telephone. HOLLSTROM at Figs. 1, 4, col. 3 lines 1-13. The WAP server module of HOLLSTROM does include an infrared interface for receiving signals and an interface for connectivity to a “utility device”, but does not include a display, nor circuitry coupled with the display. HOLLSTROM at col. 4 lines 47-62. Further, HOLLSTROM lacks mention of configuration of the interface for utility device connectivity or a confirmation display of such configuration. Thus, Applicants respectfully submit HOLLSTROM does not anticipate amended claim 1.

In view of the amendments to claim 1 and the comments above, Applicants have overcome the rejections to claim 1 based on KAISER and HOLLSTROM and consequently put claim 1 in condition for allowance. Amended claim 26, an independent claim, includes recitations similar to those of amended claim 1 and is therefore distinguished from HOLLSTROM for reasons similar to those of claim 1.

Claims 3 and 7 depend from allowable claim 1 and claim 28 depends from claim 26. Thus, claims 3 and 7 are in condition for allowance for at least the reasons as claim 1, and claim 28 is distinguishable from the prior art for at least the reasons of claim 26, stated above.

REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 2, 4, and 8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kaiser, et al. (U.S. Pub. No. 2002/0120724; “KAISER”) in view of Linares, et al. (U.S. Pat. No. 6,442,032; “LINARES”), Charlier et al. (U.S. Patent No. 6,577,877; “CHARLIER”), and Sheridan et al. (U.S. Patent No. 6,725,032; “SHERIDAN”), respectively. Claims 12, 15, 16, and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lioy, et al. (U.S. Patent No. 6,775,553; “LIOY”) in view of Hollstrom, et al. (U.S. Pat. No. 6,968,365; “HOLLSTROM”). Claims 26 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over KAISER in view of LIOY. Claims 27, 29, and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over KAISER in view of LIOY in further view of LINARES, CHARLIER, and SHERIDAN, respectively. Claims 31-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over LIOY in view of HOLLSTROM. Applicants overcome these rejections in view of the amendments made above and the remarks that follow.

Because claims 2, 4, and 8 incorporate the limitations of allowable claim 1, claims 2, 4, and 8 are allowable for at least the same reasons as claim 1.

With respect to claim 12, it is well established that obviousness requires a teaching or a suggestion by the relied upon prior art of all the elements of a claim. Without conceding the appropriateness of the combination, Applicants respectfully

submit that any combination of LIOY and HOLLSTROM does not meet the requirements of an obviousness rejection in that neither teaches nor suggests

configuring *a second interface* of the server to operate based on the configuration information, wherein the second interface is *capable of two way communication with a network*; and  
*displaying* on a display of the server an indication of the *configuration information of the second interface*, wherein the configuration information was *received via the first interface*

recitations of amended claim 12 (emphasis added).

As discussed above, HOLLSTROM discloses a WAP server module but is silent with regard to a second interface on the WAP server capable of two way communication with a network. Furthermore, HOLLSTROM does not contain any teaching or suggestion of two way communication on the second WAP server interface, and thus can teach or suggest neither configuring such an interface nor displaying the configuration of such an interface. Therefore, HOLLSTROM cannot teach or suggest the above recitations of claim 12.

Similarly, LIOY is silent with regard to configuring a second network interface of the server that is capable of two way communication with a network. For example, please consider Fig. 1 of LIOY. The Mobile Station (MS) of LIOY lacks a second network interface capable of two way communication with a network. True, LIOY shows a first network interface that can receive signal  $U_m$ , but does not teach or suggest a second two way network interface for the Mobile Station MS. Instead LIOY teaches configuration information for the Mobile Terminal Device (TE2) through the signal  $U_m$ . Further, LIOY does not teach or suggest configuring the interface on the Wireless Communication Device (MT2) to which the  $R_m$  link connects. Consequently, LIOY does not teach or suggest configuring a second network interface capable of two way communication with

a network. Thus, LIOY cannot teach or suggest displaying a confirmation of such configuration information.

Since LIOY and HOLLSTROM, taken separately, are devoid of any teaching or suggestion of the above recitations of claim 12 recited, the combination of LIOY and HOLLSTROM must necessarily be devoid of the required teaching or suggestion of the elements recited in claim 12. Consequently, the combination cannot make Applicants' claim 12 obvious.

Applicants would like to emphasize that the preceding paragraphs were not intended to attack LIOY and HOLLSTROM separately. But instead, Applicants have shown how each is devoid of claimed elements so that, by default, the combination is also devoid of at least some of the features of Applicants' claim.

Since claims 15, 16, and 19 depend from claim 12, the rejection of these claims has been overcome for at least the same reasons as claim 12.

With regard to claim 26, KAISER is silent with regard to a confirmation display of user input network configuration information. Applicants would like to point out that silence is not a proper substitute for an adequate teaching or suggestion of facts from which a conclusion of obviousness may justifiably follow. As mentioned above, LIOY does not teach or suggest configuring a second network interface capable of two way communication with a network and cannot teach or suggest displaying a confirmation of such configuration information. Thus, without conceding the appropriateness of the combination, any combination of KAISER with LIOY is necessarily devoid of at least some of the elements recited by claim 26. Claim 26 is thus in condition for allowance.

Since claims 27, 29, and 30 depend from claim 26, the rejection of these claims has been overcome for at least the same reasons as claim 26.

Independent claim 31 recites elements similar to those that put claim 12 into condition for allowance and is therefore allowable under similar rationale. Claim 33 depends from claim 31 and is, therefore, also allowable for at least the reason of allowable claim 31.

### Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome by amendment in view of the comments above. Therefore, claims 1-4, 7, 8, 12, 15, 16, 19, and 26-33 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,  
**BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP**

Date: April 11, 2006

  
\_\_\_\_\_  
Paul A. Mendonsa  
Attorney for Applicant  
Reg. No. 42,879

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(503) 439-8778